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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

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Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION BY AND BETWEEN
REORGANIZED DEBTORS, PERA,
AND RKS CLAIMANTS
REGARDING SCHEDULE TO FILE
SUPPLEMENTAL OBJECTIONS TO
PERA COMPLAINT AND SECOND
RKS AMENDMENT**

[No Hearing Requested]

1 PG&E Corporation and Pacific Gas and Electric Company, as reorganized debtors (the
2 **“Reorganized Debtors”**) in the above-captioned cases (the **“Chapter 11 Cases”**), the Public
3 Employees Retirement Association of New Mexico (**“PERA”**), and the Rolnick Kramer Sadighi
4 LLP Claimants (the **“RKS Claimants,”** and together with the Reorganized Debtors and PERA,
5 the **“Parties”**), by and through their respective counsel, hereby stipulate and agree as follows:

6 **RECITALS**

7 **WHEREAS**, PERA incorporated the Third Amended Complaint filed in the United States
8 District Court of the Northern District of California (the **“PERA Complaint”**), which is 218 pages
9 and includes 706 paragraphs of allegations, into its proofs of claim, and the RKS Claimants filed
10 an Amended Statement of Claim on Behalf of the RKS Claimants (the **“RKS Amendment”**),
11 which is 195 pages and includes 673 paragraphs of allegations;

12 **WHEREAS**, the Order Authorizing Amendment and Objection Procedures for Securities
13 Claims (the **“Scheduling Order”**) provides that “[t]he Reorganized Debtors will serve a
14 supplemental objection within 30 days after the Court issues an order with respect to the motions
15 to dismiss (if such claims are not wholly dismissed) akin to and providing the typical information
16 set forth in an answer to an adversary proceeding” (Dkt. 13934);

17 **WHEREAS**, on December 13, 2023, Reorganized Debtors filed their Thirty-Third
18 Securities Omnibus Claims Objection to PERA’s and Securities Act Plaintiffs’ Third Amended
19 Complaint (the **“33rd Omnibus Objection”**) (Dkt. 14200);

20 **WHEREAS**, on December 13, 2023, Reorganized Debtors filed their Thirty-Fourth
21 Securities Claims Omnibus Objection to Claims Adopting RKS Amendment (the **“34th Omnibus**
22 **Objection”** and, together with the 33rd Omnibus Objection, the **“Omnibus Objections”**) (Dkt.
23 14203);

24 **WHEREAS**, on September 18, 2024, the Court issued a Memorandum Decision on Thirty-
25 Third and Thirty-Fourth Securities Omnibus Claims Objections (the **“Omnibus Objections**
26 **Memorandum”**) (Dkt. 14593);

27 **WHEREAS**, on September 19, 2024, the Court issued an Order Overruling in Part and
28 Sustaining in Part Thirty-Third Securities Claims Omnibus Objection and an Order Overruling in

1 Part and Sustaining in Part Thirty-Fourth Securities Claims Omnibus Objection (the “**Omnibus**
2 **Objections Orders**” and, together with the Omnibus Objections Memorandum, the “**Omnibus**
3 **Objections Decision**”) (Dkts. 14594, 14595);

4 **WHEREAS**, on October 8, 2024, the RKS Claimants filed the Second Amended Statement
5 of Claim on Behalf of the RKS Claimants (the “**Second RKS Amendment**”), which is 194 pages
6 and includes 677 paragraphs of allegations (Dkt. 14603);

7 **WHEREAS**, the Parties have conferred regarding a schedule for the Reorganized Debtors
8 to file supplemental objections to the PERA Complaint and the Second RKS Amendment;

9 **WHEREAS**, PERA and the RKS Claimants agree and stipulate that PG&E may file
10 supplemental objections on or before November 21, 2024, which is 30 days after the October 22,
11 2024 status conference;

12 **WHEREAS**, this Stipulation shall have no effect other than what is provided for herein,
13 including regarding the case schedule and discovery;

14 **WHEREAS**, the Parties reserve all rights related to the Omnibus Objections Decision.

15 **NOW, THEREFORE**, the Parties hereby stipulate and agree as follows, subject to
16 approval of the Court:

17 1. The Reorganized Debtors shall have until November 21, 2024 to file a supplemental
18 objection to the PERA Complaint.

19 2. The Reorganized Debtors shall have until November 21, 2024 to file a supplemental
20 objection to the Second RKS Amendment.

21 3. This Stipulation shall constitute the entire agreement and understanding of the Parties
22 relating to the subject matter hereof and shall supersede all prior agreements and understandings
23 relating to the subject matter hereof.

24 4. This Stipulation may be executed in counterparts, each of which shall be deemed an
25 original, but all of which together shall constitute one and the same agreement.

26 5. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies
27 arising from this Stipulation or any Order approving the terms of this Stipulation.
28

1 Dated: October 14, 2024

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